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6 Attorney for:
RAYCHELLE IVORY

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 vs.
13 RAYCHELLE IVORY ,
14 Defendant.

Case No.: 2:15-CR-017-JAD-VCF

STIPULATION TO EXTEND
REPLY DEADLINE
(First Request)

15 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United
16 States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United
17 States of America, and Rene L. Valladares, Federal Public Defender, and MONIQUE KIRTLEY,
18 Assistant Federal Public Defender, counsel for RAYCHELLE IVORY, that the Previously
19 Scheduled Reply Deadline of June 1, 2015 for Motion to Suppress (#37) be extended for four (4)
20 days to and including June 5, 2015.

21 This Stipulation is entered into for the following reasons:

- 22 1. The client is in custody but does not oppose the continuance.
- 23 2. Defense counsel was out of the jurisdiction when the response was filed Tuesday,
24 May 26, 2015 and needs additional time to research and prepare the reply. PACER set the Reply
25 deadline for Monday, June 1, 2015.
- 26 3. The additional time requested herein is not sought for purposes of delay, but merely
27 to allow counsel for the defendant sufficient time to draft a specific reply.
28

1 4. Denial of this request for continuance would deny counsel for the defendant sufficient
2 time to effectively and thoroughly prepare, taking into account the exercise of due diligence.

3 5. This is the first stipulation to extend the reply deadline filed herein.

4 DATED: June 1, 2015

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6 RENE L. VALLADARES
Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

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8 By: /s/ Monique Kirtley
MONIQUE KIRTLEY,
9 Assistant Federal Public Defender

By: /s/ Phillip N. Smith, Jr.
PHILLIP N. SMITH, JR.,
Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAYCHELLE IVORY ,

Defendant.

Case No.: 2:15-CR-017-JAD-VCF

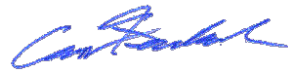
ORDER

Based on the stipulation of counsel, for all of the above-stated reasons, the ends of justice and judicial economy would best be served by granting the requested extension to file reply.

ORDER

IT IS THEREFORE ORDERED, that the Previously Scheduled Reply Deadline of June 1, 2015 for Motion to Suppress (#37) be extended for four (4) days to and including Friday, June 5, 2015.

DATED 2nd day of June, 2015.



UNITED STATES MAGISTRATE JUDGE